

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

CASE NO. 23-CR-80219-CANNON

UNITED STATES OF AMERICA,
Plaintiff,
vs.

MICHAEL DOUGLAS,
Defendant.

_____ /

MOTION TO SEAL

COMES NOW the Defendant, and hereby moves this Honorable Court to seal the referenced pleading with Exhibit D, the Comprehensive Neuropsychological Evaluation by Dr. Segel, Exhibit F and Exhibit G Medical Reports by Dr. Howard in support of Defendant's Request for Sentencing Departure and/or Variance because it contains confidential information relating to the defendant's medical and mental health records.

Respectfully submitted,

HECTOR DOPICO
FEDERAL PUBLIC DEFENDER

s/ Scott Berry

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CERTIFICATE OF SERVICE

I hereby certify that on August 18, 2025, I electronically filed the foregoing document with the Clerk of the Court using CM/ECF. I also certify that the foregoing document is being served this day on all counsel of record via transmission of Notices of Electronic Filing generated by CM/ECF or in some other authorized manner for those counsel or parties who are not authorized to receive electronically Notices of Electronic Filing.

s/ Scott Berry

Scott Berry